

1 Paul S. Padda  
2 NV Bar No. 10417  
3 PAUL PADDA LAW, PLLC  
4 4560 South Decatur Blvd., Suite 300  
5 Las Vegas, NV 89103  
6 Tel: 702.366.1888  
7 psp@paulpaddalaw.com

8 Paul J. Lukas, MN Bar No. 22084X\*  
9 lukas@nka.com  
10 Kai H. Richter, MN Bar No. 0296545\*  
11 krichter@nka.com  
12 Brock J. Specht, MN Bar No. 0388343\*  
13 bspeccht@nka.com  
14 Benjamin J. Bauer, MN Bar No. 0398853\*  
15 bbauer@nka.com  
16 NICHOLS KASTER, PLLP  
17 4700 IDS Center  
18 80 S 8th Street  
19 Minneapolis, MN 55402  
20 Telephone: (612) 256-3200  
21 Facsimile: (612) 338-4878

22 \*admitted pro hac vice

23 ATTORNEYS FOR PLAINTIFF AND THE PROPOSED CLASS

24 **UNITED STATES DISTRICT COURT**  
**DISTRICT OF NEVADA**

25 MAGGIE THOMSON, as representative of a  
26 class of similarly situated persons, and on  
behalf of the Caesars Entertainment  
Corporation Savings & Retirement Plan,

27 Plaintiff,

28 v.

RUSSELL INVESTMENTS TRUST  
COMPANY, CAESARS HOLDINGS,  
INC., THE PLAN INVESTMENT  
COMMITTEE, and THE 401(K) PLAN  
COMMITTEE.

Case No. 2:21-cv-00961-GMN-BNW

29 **STIPULATION REGARDING SECOND  
AMENDED COMPLAINT AND  
DEADLINE TO ANSWER OR  
OTHERWISE RESPOND**

(FIRST REQUEST)

30 Defendants.

1 Plaintiff Maggie Thomson, as representative of a class of similarly situated persons, and on  
 2 behalf of the Caesars Entertainment Corporation Savings & Retirement Plan, and Defendants  
 3 Russell Investments Trust Company, Caesars Holdings, Inc., the Plan Investment Committee, and  
 4 the 401(k) Plan Committee (collectively, the “Parties”), by and through their undersigned counsel,  
 5 hereby stipulate and agree that Plaintiff Maggie Thomson, pursuant to Fed. R. Civ. P. 15(a)(1)(B),  
 6 will file a Second Amended Complaint as of right on or before September 20, 2021 in response to  
 7 Defendants’ motions to dismiss. *See Ramirez v. Cty. of San Bernardino*, 806 F.3d 1002, 1006-1007  
 8 (9th Cir. 2015).<sup>1</sup> The Parties further stipulate that the deadline for Defendants to answer or  
 9 otherwise respond to the Second Amended Complaint, which would otherwise be on October 4,  
 10 2021, shall be extended to October 20, 2021. Plaintiff avers that there is good cause to enter into  
 11 this stipulation to allow Plaintiff to address the issues raised in Defendants’ motions, and that this  
 12 stipulation is not made for purposes of delay. This is the first request for an extension of time to  
 13 respond to the anticipated Second Amended Complaint.

14 Accordingly, the Parties request that the Court approve this stipulation and grant Defendants  
 15 until October 20, 2021 to answer or otherwise respond to Plaintiff’s Second Amended Complaint,  
 16 which she will file on or before September 20, 2021. Defendants do not waive any defenses by  
 17 entering into this stipulation.

19 Dated: September 8, 2021

20 NICHOLS KASTER, PLLP

21 /s/ Benjamin J. Bauer

22 Paul J. Lukas, Esq. (*admitted pro hac vice*)  
 Kai H. Richter, Esq. (*admitted pro hac vice*)  
 Brock J. Specht, Esq. (*admitted pro hac vice*)  
 Benjamin J. Bauer, Esq. (*admitted pro hac  
 vice*)  
 4700 IDS Center  
 80 S. 8th Street  
 Minneapolis, MN 55402  
 Telephone: (612) 256-3200

27 PAUL PADDA LAW, PLLC

Dated: September 8, 2021

MCDONALD CARANO LLP

/s/ Adam Hosmer-Henner

Adam Hosmer-Henner, Esq., NSBN. 12779  
 Chelsea Latino, Esq., NBSN 14227  
 Jane Susskind, Esq., NSBN 15099  
 100 West Liberty Street, 10th Floor  
 Reno, NV 89501  
 Telephone: (775) 788-2000

MAYER BROWN LLP

Nancy G. Ross (*admitted pro hac vice*)  
 Richard E. Nowak (*admitted pro hac vice*)  
 71 South Wacker Drive

28 <sup>1</sup> The parties agree that Plaintiff may only amend her pleading further with the consent of  
 Defendants or the Court’s leave. Fed. R. Civ. P. 15(a)(2).

1 Paul S. Padda, Esq.  
2 4560 South Decatur Blvd., Suite 300  
3 Las Vegas, NV 89103  
4 Telephone: (702) 366-1888  
5 *Attorneys for Plaintiff*

6 Chicago, IL 60606  
7 Telephone: (312) 701-8788  
8 *Attorneys for Defendant Caesars Holdings,  
9 Inc., the Plan Investment Committee, and the  
10 401(k) Plan Committee*

11 PARSONS, BEHLE & LATIMER  
12 /s/ Michael R. Kealy  
13 Rew R. Goodenow, Esq. NSBN 3722  
14 Michael R. Kealy, Esq. NSBN 971  
15 50 West Liberty Street, Suite 750  
16 Reno, NV 89501  
17 Telephone: (775) 323-1601

18 MILBANK LLP  
19 Sean Murphy, Esq. (*admitted pro hac vice*)  
20 Robert Hora, Esq. (*admitted pro hac vice*)  
21 Vanessa Gonzalez-Ahmed, Esq. (*admitted  
22 pro hac vice*)  
23 Maria Esperanza Ortiz, Esq. (*admitted pro  
24 hac vice*)  
25 55 Hudson Yards  
26 New York, NY 10001  
27 Telephone: (212) 530-5000  
28 *Attorneys for Defendant Russell Investments  
Trust Company*

29 **Order**

30 **IT IS SO ORDERED**

31 **DATED:** 10:18 am, September 09, 2021

32   
33 **BRENDA WEKSLER**  
34 **UNITED STATES MAGISTRATE JUDGE**